

EXHIBIT C-2

**EXHIBIT B TO ORDER SETTING VARIOUS DEADLINES
REGARDING OBJECTIONS TO ASBESTOS PROPERTY DAMAGE CLAIMS**

I. Schedule re Daubert Hearing: Dust Sampling Methodologies (the "methodology issue") on Methodology Issue	<u>Deadline</u>
A. Designation of experts and submission of expert reports addressing <u>Non-expert discovery may commence upon the methodology issue by parties who did not previously do so</u> entry of the Order and the determination of any objections thereto that may be asserted pursuant to paragraph 9 of the Order	10/6/06
B. <u>Designation of fact and expert witnesses and subject matter on which such witnesses are expected to testify or types of experts who are expected to testify and the nature of their expertise**</u>	10/25/06
C. B- Debtors' additional rebuttal expert reports on the methodology issue and identification of rebuttal fact witnesses and the general subject matter of such fact witness testimony with respect to any new matters raised by the additional experts and reports filed as outlined in I.B.A above.	10/25/06 11/25/06
D. C- Depositions of expert and non-expert witnesses may begin	10/30/06 11/30/06
E. D- Last day for depositions <u>Conclusion of expert and non-expert witnesses</u> all discovery	1/12/07
F. E- Final fact witness/expert witness list due	1/21/07
G. F- Preliminary pre-trial conference	January 2007 omnibus 1/22/06 Omnibus Hearing in Wilmington, Delaware
H. G- Briefs <u>Trial briefs</u> due	_____
I. H- Daubert hearing <u>Hearing on Methodology Issue</u>	_____
	9:00 a.m. Pittsburgh
<u>** The Debtors and the PD Committee have previously made their preliminary disclosure of fact witnesses and shall be bound thereby, without the necessity for doing so again</u>	
II. Schedule re Adjudication of Lack of Hazard, Product Identification and, Limitation Periods and the Libby issue as Outlined in the 15th	

Omnibus Objection	
<u>A.</u> <u>Non-expert discovery may commence upon the entry of the Order and the determination of any objections thereto that may be asserted pursuant to paragraph 9 of the Order</u>	
<u>B.</u> A. Designation <u>Preliminary designation of fact and expert witnesses and subject matter on which such witnesses are expected to testify or types of experts who are expected to testify and the nature of their expertise</u>	10 11/614/06
<u>C.</u> B. Debtors' supplemental <u>Supplemental identification of additional witnesses based on the disclosures outlined in II.AB above</u>	10 12/253/06
<u>C.</u> Debtors to designate experts, submit expert reports and identify fact witnesses and general subject matter of testimony for limitation period issues	11/15/06
<u>D.</u> Claimants to designate experts, submit expert reports and identify fact witnesses and general subject matter of testimony for lack of hazard and product identification issues	11/15/06
<u>E.</u> Depositions of expert and non-expert witnesses may begin	12/5/06
<u>F.</u> Debtors to designate experts, submit expert reports and designate fact witnesses on lack of hazard and product identification issues	12/22/06
<u>D.</u> G. Claimants <u>All parties to designate experts, submit expert reports and designate fact witnesses on limitation period, product identification and Libby issues</u>	12 1/2210/06 07
<u>E.</u> H. Preliminary pre-trial conference on gateway issues <u>All parties to submit rebuttal expert reports on limitation period, product identification and Libby issues</u>	January omnibus1/25 /07
<u>F.</u> I. All written fact discovery must be completed <u>Depositions of expert and non-expert witnesses may begin</u>	1/1530/0607
<u>G.</u> J. All depositions of expert <u>Preliminary pre-trial conference on limitation period, product identification and non-expert witnesses must be completed</u> <u>Libby issues</u>	31/522/06 Omnibus Hearing in Wilmington, Delaware
<u>H.</u> K. Final fact witness/expert witness lists due, including <u>Conclusion of all discovery in respect of limitation period, product identification of expert witness by issue on which that expert shall opine</u> <u>and Libby issues</u>	3/165/0706
<u>I.</u> L. Identification <u>Final fact witness/expert witness lists due, including identification of deposition testimony from prior proceedings to be used at hearing</u> <u>expert witness by issue on which that expert shall opine</u>	3/16/07

<u>J.</u>	M. Pre-trial motions, including motions <u>for summary judgment and in limine and Daubert</u>	
	1. Opening papers due	3/16/07
	2. Responses due	4/9/07
	3. Replies due	4/16/07
	4. Hearing, if any	TBD
<u>K.</u>	N. Trial briefs and trial exhibits, identified by issue to which the exhibits pertain	4/13/07
<u>L.</u>	O. Final pretrial conference	TBD
<u>M.</u>	P. Trial on product identification, statute of limitations <u>limitation</u> , and Libby issue	4/23/07, 4/24/07, 4/25/07 9:00 a.m. Pittsburgh
III.	<u>Schedule re Adjudication of Lack of Hazard issue as Outlined in the 15th Omnibus Objection</u>	
<u>A.</u>	<u>Non-expert discovery may commence upon the entry of the Order and the determination of any objections thereto that may be asserted pursuant to paragraph 9 of the Order</u>	
<u>B.</u>	<u>Preliminary designation of fact and expert witnesses and subject matter on which such witnesses are expected to testify or types of experts who are expected to testify and the nature of their expertise</u>	12/14/06
<u>C.</u>	<u>Supplemental identification of additional witnesses based on the disclosures outlined in III.B above</u>	1/10/07
<u>D.</u>	<u>All parties to submit expert reports on lack of hazard issue</u>	2/10/07
<u>E.</u>	<u>All parties to submit rebuttal expert reports on lack of hazard issue</u>	2/25/07
<u>F.</u>	<u>Depositions of expert and non-expert witnesses related to lack of hazard issue may begin</u>	2/30/07
<u>G.</u>	<u>Preliminary pre-trial conference on lack of hazard issue</u>	2/26/06 <u>Omnibus</u> <u>Hearing in</u> <u>Wilmington,</u> <u>Delaware</u>
<u>H.</u>	<u>Conclusion of all discovery in respect of lack of hazard issue</u>	4/5/06
<u>I.</u>	<u>Final fact witness/expert witness lists due, including identification of expert witness by issue on which that expert shall opine</u>	4/16/07

<u>J.</u>	<u>Pre-trial motions, including motions for summary judgment and in limine</u>	
<u>1.</u>	<u>Opening papers due</u>	<u>4/16/07</u>
<u>2.</u>	<u>Responses due</u>	<u>5/9/07</u>
<u>3.</u>	<u>Replies due</u>	<u>5/16/07</u>
<u>4.</u>	<u>Hearing, if any</u>	<u>TBD</u>
<u>K.</u>	<u>Trial briefs and trial exhibits, identified by issue to which the exhibits pertain</u>	<u>5/13/07</u>
<u>L.</u>	<u>Final pretrial conference</u>	<u>TBD</u>
<u>M.</u>	<u>Q-Trial on lack of hazard <u>issue</u></u>	May __ and __, 2007 <u>2007</u> , 9:00 a.m. Pittsburgh
<u>IV.</u>	III -Hearing on Estimation of Remaining PD Claims not disallowed as a result of I , <u>II</u> and III above	TBD

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